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December 2, 2021

VIA ECF FILING

The Honorable John Milton Young
United States District Court, Eastern District of Pennsylvania
4007 U.S. Courthouse, Courtroom 4A
Philadelphia, PA 19106

Re: Buccigrossi v. Thomas Jefferson University, Case No. 21-cv-000221-JMY
Joint Request for Extension of Scheduling Order

Dear Judge Young:

I represent Defendant Thomas Jefferson University ("Jefferson") in the above-captioned matter. I write pursuant to Rule A.I. of Your Honor's Policies and Procedures to seek an additional extension of the Court's August 31, 2021 Scheduling Order (ECF No. 26). Counsel for Plaintiff Lena Buccigrossi joins in this request.

The parties continue to diligently engage in written discovery and document production, with Jefferson having produced over 7,600 pages of documents to date. However, the parties require additional time to complete written discovery and take depositions due to, among other things, the extent of ESI discovery, competing deadlines in other cases, and the continued impact of COVID-19. Accordingly, the parties request an additional extension of existing litigation deadlines as set forth below:

Event	Current Deadline	Proposed Deadline
Close of Fact Discovery	January 31, 2022	May 2, 2022
Plaintiff's Expert Report(s) Due	February 14, 2022	May 16, 2022
Defendant's Expert Report(s) Due	February 28, 2022	May 30, 2022
Close of Expert Discovery	March 14, 2022	June 13, 2022
Dispositive Motions Due	April 12, 2022	July 11, 2022
Responses to Dispositive Motions Due	May 12, 2022	August 10, 2022
Pretrial Memoranda Due	August 2, 2022	October 31, 2022
Final Pretrial Conference	August 9, 2022 10:00am	November 7, 2022 10:00am

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The parties thank you for your consideration to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "M. Baughman" with a stylized flourish at the end.

Michael Baughman